1		The Honorable Barbara J. Rothstein
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13	UNITED STATES DISTRICT COURT	
14 15	WESTERN DISTRICT OF WASHINGTON	
16	KENNETH WRIGHT, on his own behalf and on behalf of other similarly situated persons,	NO. 2:14-cv-00421-BJR
17	Plaintiff,	
18	v.	NOTICE OF SETTLEMENT
19	LYFT, INC., a Delaware corporation,	
20   21	Defendant.	
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	NOTICE OF SETTLEMENT (NO. 2:14-cv-00421-BJR) - 1	

Plaintiff Kenneth Wright, through his counsel Donald W. Heyrich and Peter Stutheit, and Defendant Lyft, Inc. ("Lyft"), through its counsel Archis A. Parasharami of Mayer Brown LLP, and Bradley S. Keller and Keith D. Petrak of Byrnes Keller Cromwell LLP, submit this joint notice to inform the Court that a settlement in principle has been reached in this action. Counsel state as follows:

- 1. Plaintiff Wright and Defendant Lyft have reached a settlement agreement in principle in this case that would resolve the claims of a proposed class of Washington residents.
- 2. At this time, the parties are negotiating the terms of and preparing the formal settlement agreement.
- 3. Plaintiff Wright expects to file a motion for preliminary approval of the settlement within 60 days—that is, on or before Friday, September 21, 2018.

Respectfully submitted,

## Counsel for Plaintiff Kenneth Wright

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**CERTIFICATE OF SERVICE** The undersigned attorney certifies that on the 23rd day of July, 2018, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel on record in the matter. /s/ Archis A. Parasharami Archis A. Parasharami MAYER BROWN LLP 1999 K Street N.W. Washington, D.C. 20016 Tel: (202) 263-3000 Fax: (202) 263-3300 Email: aparasharami@mayerbrown.com